

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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February 7, 2020

**Via Electronic Filing**

The Honorable Magistrate Judge Robert W. Lehrburger  
U.S. District Court Southern District of New York  
500 Pearl St  
New York, NY 10007

Re: *Basurto et al v. Eda Food Inc. et al* - Request for Extension  
Case No.: 1:18-cv-08858-AJN

Dear Honorable Judge Lehrburger:

This law firm represent the Defendants Eda Food Inc., Karena Foods Inc. and Gary Tulsiani (together, the “Defendants”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules I(A) and III(B), this letter respectfully serves to request the scheduling of a Settlement Conference on: (i) the afternoon of Tuesday, February 25, 2020; (ii) the afternoon of Thursday, February 27, 2020; (iii) the morning of Friday, February 28, 2020; or (iv) to a mutually convenient date and time scheduled by the Court. This is the first request of its kind, and would not affect any other scheduled deadlines. Prior to submitting this application undersigned has reached out to Plaintiffs’ counsel to obtain its consent. However, Plaintiffs’ counsel has not responded. Thus, Plaintiffs’ counsel has neither consented nor objected to this request.

By way of background, on November 13, 2019, counsel for both parties appeared before the Court for a Settlement Conference. The Settlement Conference was adjourned, *sin die*, because certain individual Plaintiffs failed to appear in person, and ceased communicating with Plaintiffs’ counsel.

In light of the foregoing, Defendants respectfully request that Your Honor schedule a Settlement Conference on: (i) the afternoon of Tuesday, February 25, 2020; (ii) the afternoon of Thursday, February 27, 2020; (iii) the morning of Friday, February 28, 2020; or (iv) to a mutually convenient date and time scheduled by the Court.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein  
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Cc: Plaintiffs' counsel (via ECF)